

**pIN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

NELSON L. BRUCE,

Plaintiff,

v.

Case No.: 2:22-cv-02211-BHH-MGB

LEXISNEXIS RISK SOLUTIONS INC., *et al.*

Defendants.

**DEFENDANT LEXISNEXIS RISK SOLUTIONS INC.’S MOTION TO DISMISS
PLAINTIFF’S SECOND AMENDED COMPLAINT**

Defendant LexisNexis Risk Solutions Inc. (“LNRS”), by counsel, pursuant to Federal Rule of Civil Procedure 12(b)(6), respectfully moves to dismiss Plaintiff’s Second Amended Complaint, Dkt. No. 96. A memorandum in support of LNRS’ Motion is filed contemporaneously herewith and incorporated herein by reference.

WHEREFORE, LNRS respectfully requests the Court grant this Motion to Dismiss, dismiss the claims asserted against LNRS in Plaintiff’s Second Amended Complaint, and grant any further relief the Court may deem appropriate.

Dated: June 6, 2023.

/s/ William J. Farley III

William J. Farley III

Fed. Bar No. 12004

Troutman Pepper Hamilton Sanders LLP

301 S. College Street, Suite 3400

Charlotte, NC 28202

Telephone: 704.998.4099

Email: will.farley@troutman.com

*Counsel for Defendant LexisNexis Risk Solutions
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of June 2023, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system and also sent via U.S. Mail to the following:

Nelson L. Bruce
PO Box 3345
Summerville, SC 29484
Pro Se Plaintiff

/s/William J. Farley III
William J. Farley III